



BOB BAK CONSTRUCTION

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MSHA/OSRV

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**MSHA Office of Standards and Regulations
and Variances**

**1100 Wilson Road - Room 2350
Arlington, VA 22209-3939**

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Ref: Comments on Civil Penalty Proposals

To eliminate the nominal \$60.00 penalty for nonsignificant and substantial violations and replace it with more civil penalty assessments would not serve any purpose that would guarantee more safety awareness.

MSHA 's intent to continue to put more power in the hands of the inspectors to determine penalties and increase penalty points for what they determine to be negligence and gravity should be eliminated. Inspectors, using the authority they now have, should concentrate on consistencies in inspections in determining citations and their severity.

None of the proposals for change as set forth by MSHA will necessarily induce greater mine compliance or improve safety for the operator and miners.

Submitted by:

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Robert Bak, Owner

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